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 10 *Attorneys for Defendant,*
 11 *ORACLE AMERICA, INC.*

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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

10 BRIAN HERTZ, an individual,
 11 Plaintiff,
 12 vs.
 13 ORACLE AMERICA, INC., a Foreign
 14 Corporation,
 15 Defendant.

16 CASE NO.: 2:25-cv-00360-APG-DJA

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**STIPULATION AND ORDER TO
 EXTEND TIME FOR DEFENDANT TO
 FILE RESPONSE TO PLAINTIFF'S
 COMPLAINT**

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 22 Pursuant to Local Rules IA 6-1 and IA 6-2, Defendant Oracle America, Inc. ("Defendant")
 23 and Plaintiff Brian Hertz ("Plaintiff") hereby requests an extension of time, up to and including April
 24 16, 2025, for Defendant to file its response to Plaintiff's Complaint (ECF. No. 1). The present
 25 deadline for Defendant to file its response is March 17, 2025. This is the parties' first request for
 26 an extension of time for Defendant to file its response.

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1 Defendant respectfully requests this extension in order to have the time to fully research the
 2 facts and circumstances underlying this case, to allow the parties time to explore resolution, and not
 3 for purposes of delay. Good cause exists to extend the response deadline. Therefore, the parties
 4 respectfully request a thirty day extension of time up to and including April 16, 2025 for Defendant
 5 to file its response to Plaintiff's Complaint.

6 DATED this 12th day of March, 2025.

7 HKM EMPLOYMENT ATTORNEYS LLP

9 /s/ *Michael Arata*

10 Michael Arata
 11 Nevada Bar No. 11902
 12 101 Convention Center Dr., Suite 600
 13 Las Vegas, NV 89109

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 15 *Attorneys for Plaintiff,*
 16 *Brian Hertz*

6 DATED this 12th day of March, 2025.

7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
 8 P.C.

9 /s/ *Kathryn C. Newman*

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 15 *Attorneys for Defendant,*
 16 *Oracle America, Inc.*

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 18 **ORDER**



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 20 DANIEL J. ALBREGTS
 21 UNITED STATES MAGISTRATE JUDGE

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 23 DATED: 3/13/2025